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Docket: EPA-HQ-OPP-2016-0385
FIFRA Scientific Advisory Panel; Notice of Public Meeting

Comment On: EPA-HQ-OPP-2016-0385-0001
Meetings: Federal Insecticide, Fungicide, and Rodenticide Act Scientific Scientific Advisory
Panel

Document: EPA-HQ-OPP-2016-0385-0219
Comment submitted by J. Hoy

Submitter Information

General Comment

Dear EPA,

Glyphosate, the main ingredient in Roundup, has far worse effects on animals than causing cancer. It is a patented mineral chelator and consequently exposure to glyphosate during development results in multiple birth defects as a result of mineral deficiency. Glyphosate disrupts Vitamin A, also resulting in birth defects. Glyphosate disrupts multiple genes which dictate the placement and formation of developing organs, again resulting in multiple birth defects. The wild and domestic grazing animals, especially those that eat in or near fields sprayed with Roundup have multiple birth defects, which cause mortality soon after birth or result in inhumane suffering if they survive to weaning. The most common birth defect is underdeveloped facial bones resulting in underbite or overbite and inability to bite off foliage and get adequate nutrition. This is especially detrimental to wild grazing animals, like bighorn sheep, mountain goats, mule deer and moose that live in mountainous areas where there is little food and lots of snow in winter, resulting in serious population declines. Also, the male bison in Yellowstone National Park and on the National Bison Range in Montana, as well as all the other wild grazing animals in Western United States have a high prevalence of male reproductive malformations consistent with gene disruption and mineral deficiencies. This seriously affects their ability to produce viable sperm.

These birth defects began when the use of Roundup was extensively increased in Western States on Roundup Ready crops and use as a dry down agent on both GMO and regular crops. The CDC records were examined for increases in birth defects on human children. Not likely a coincidence, all of the birth defects and health issues found on the wild and domestic animals were going up sharply on the human newborns throughout the United States. Health issues documented on all ages of the other animals were going up sharply on humans of all ages, liver cancer being one. This is important, since you are considering glyphosate's cancer causing properties. Interestingly, birth defects in the CDC records on human newborns, that were not found on other animals were not going up and in some cases were going down. Even more interestingly, although correlation does not prove causation, the sharp increase in the birth defects and health issues common to many species of animals and shown to be increasing in humans according to the CDC records of human newborns and humans of all ages, closely correlated with the increase in the use of Roundup/glyphosate. See our study, <http://dx.doi.org/10.4172/2375-446X.1000132>, which showed an 85 to 98.5 percent correlation between the increase in the use of glyphosate and the increase in a total of 11 birth defects and other health issues combined on humans. The correlation found of over 90% for each of a number of birth defects is important. Additionally, the Pearson correlation coefficient of $R=0.932$ we found for increase in liver cancer in humans of all ages and the increase in use of glyphosate seems to be extremely important to your consideration of banning Roundup/glyphosate for causing cancer.

Thank you for banning Roundup/glyphosate as soon as possible, before more wild animals are caused to go extinct and to save the little children and other newborns from debilitating birth defects and cancer.

Sincerely,

Attachments

Observations Of Brachygnathia Superior in Wild Ruminants in Western Montana, USA

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Genital Abnormalities in White-tailed Deer (*Odocoileus Virginianus*) in West-Central Montana:
Pesticide Exposure as a Possible Cause

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The High Cost of Pesticides: Human and Animal Diseases